

REMARKS

Claims 19-22 are pending. An Office Action mailed June 15, 2006 rejected Claims 19-22 under 35 U.S.C. § 103. Pursuant to 37 CFR § 1.111, Applicant hereby respectfully requests reconsideration of the application.

REJECTION OF CLAIMS UNDER 35 U.S.C. § 103

The Office Action rejected Claims 19-22 as being unpatentable over Applicant admitted prior art (AAPA) (FIGURE 4) in view of Ellsberry et al. (hereinafter “Ellsberry”). With regard to Claim 19, the Office Action states that the AAPA fails to disclose a plurality of metal chip bond pads formed on the inner surfaces of the top and bottom substrates and a gold stud bump between the chip bond pads on the top and bottom substrates. The Office Action further states that Ellsberry discloses electrodes formed on opposing inner substrate surfaces, complimentary metal chip bond pads, and a gold stud bump 308 mechanically and electrically coupled between the chip bond pads on the top and bottom substrates. Applicant respectfully traverses this rejection.

Applicant submits that Ellsberry teaches that the objects labeled as 308 are solder balls (see Paragraph 0039; solder balls 306). There appears to be some mis-numbering of parts in Ellsberry. The only place that the phrase underside coupling members are used are in reference to the round objects 106 shown in FIGURE 1 which can be either gold balls or solder balls. There is no reference anywhere in the application that indicates that the solder balls 108 or 306 are gold stud bumps, (see also Paragraph 0042; underside coupling members 410 and 412). As such, Applicant submits that these underside coupling members or gold stud bumps 106, 303, 410, or 412 are not mechanically or electrically coupled between the chip bond pads on the top and bottom surfaces of the substrate.

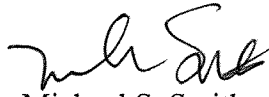
Therefore, Applicant submits that independent Claim 19 is allowable over the cited reference. Because Claims 20-22 depend from allowable independent Claim 19, they are allowable for the same reasons that make independent Claim 19 allowable.

CONCLUSION

Applicant respectfully submits that all of the claims of the pending application are now in condition for allowance over the cited references. Accordingly, Applicant respectfully requests withdrawal of the rejections, allowance, and early passage through issuance. If the Examiner has any questions, the Examiner is invited to contact the Applicant's agent listed below.

Respectfully submitted,

BLACK LOWE & GRAHAM^{PLLC}



Michael S. Smith

Registration No. 39,563

Direct Dial: 206.749.9888